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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Deshawn Briggs, et al.,

CV-18-02684-PHX-EJM

Plaintiffs,

**STIPULATED MOTION TO  
DISMISS WITH PREJUDICE ALL  
CLAIMS AND ALL REQUESTS  
FOR RELIEF ASSERTED AGAINST  
COUNTY DEFENDANTS, WITH  
THE SOLE AND EXCLUSIVE  
EXCEPTION OF PLAINTIFFS'  
REQUEST FOR ATTORNEYS'  
FEES AND COSTS INCURRED  
PRIOR TO MAY 9, 2020 IN  
ASSERTING CLAIMS AND  
REQUESTS FOR RELIEF AGAINST  
COUNTY DEFENDANTS, ONLY**

v.

Allister Adel, in her official capacity as  
County Attorney of Maricopa County, et al.,

Defendants.

To effectuate partial settlement, Plaintiffs Deshawn Briggs, Lucia Soria and Antonio Pascale, as Personal Representative of the Estate of Mark Pascale, (“Plaintiffs”) and Defendants Maricopa County and Maricopa County Attorney Allister Adel (“County Defendants”) stipulate and jointly move for entry of this Court’s Order dismissing with prejudice each and every claim and each and every request for relief asserted against County Defendants in this case, including each and every claim and each and every request for relief alleged by Plaintiffs individually and as putative class representatives on behalf of putative classes and on behalf of themselves as putative class members, including requests for attorneys’ fees and costs, with the sole and exclusive exception of Plaintiffs’ request for their reasonable attorneys’ fees and costs incurred prior to May 9, 2020 in asserting claims and requests for relief in this case against County Defendants, only.<sup>1</sup> Each side shall bear their own attorneys’ fees and costs incurred in negotiating and documenting the partial settlement and related dismissal filings.

With respect to Plaintiffs’ sole and exclusive remaining request for relief against County Defendants, *i.e.*, Plaintiffs’ request for reasonable attorneys’ fees and costs incurred prior to May 9, 2020 in asserting claims and requests for relief in this case against County Defendants, only, Plaintiffs and County Defendants are attempting to negotiate a potential out-of-court settlement of such request. If such settlement efforts are unsuccessful, Plaintiffs and County Defendants will submit such request for the Court’s determination pursuant to Rule

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<sup>1</sup> This includes not to exceed a total of one-half (50%) of nonsegregable reasonable attorneys’ fees and costs incurred in asserting claims and requests against both the County Defendants and Defendant TASC.

54, Fed. R. Civ. P., LRCiv. 54.1 and LRCiv 54.2.<sup>2</sup> Plaintiffs and County Defendants respectfully request that the Court set deadlines for Plaintiffs and County Defendants to jointly file status reports regarding the status of settlement negotiations with respect to such request on November 13, 2020, November 20, 2020, and December 4, 2020. They also request that the Court set a briefing schedule for submitting such request for the Court's determination under Rule 54, Fed. R. Civ. P., LRCiv. 54.1 and LR Civ 54.2, if Plaintiffs and County Defendants have not made notification of reaching a settlement agreement with respect to such request on or before December 4, 2020.

RESPECTFULLY SUBMITTED this 27<sup>th</sup> day of October 2020.

**ALLISTER ADEL  
MARICOPA COUNTY ATTORNEY**

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<sup>2</sup> Each side will bear their own attorneys' fees and costs incurred in settlement or litigation in relation to Plaintiffs' sole and exclusive remaining request for relief against County Defendants, *i.e.*, Plaintiffs' request for reasonable attorneys' fees and costs incurred prior to May 9, 2020 in asserting claims and requests for relief in this case against County Defendants, only.

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14 CERTIFICATE OF SERVICE

15 I hereby certify that on October 20, 2020, I caused the foregoing document to be  
16 electronically transmitted to the Clerk's Office using the CM/ECF System for filing and  
17 transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

18 Honorable Eric J. Markovich  
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/s/ S. Rojas \_\_\_\_\_